

# **EXHIBIT B**

**Subject:** Re: [EXTERNAL] Toth v. NYC DOE  
**Date:** Tuesday, September 9, 2025 at 7:56:55 PM Eastern Daylight Time  
**From:** Vyas, Jaimini (LAW)  
**To:** Anton Mikofsky  
**CC:** Lindeman, Thomas (LAW)  
**Attachments:** Giuntini 9.9.25 declaration.pdf, Exhibit to 25-09-09 letter.pdf, Toth 25-cv-3317-NRM-TAM letter.pdf

Counsel,

Please find attached the position Defendant will file shortly.

Best,

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**From:** Vyas, Jaimini (LAW) <[JVyas@law.nyc.gov](mailto:JVyas@law.nyc.gov)>  
**Date:** Tuesday, September 9, 2025 at 6:43 PM  
**To:** Anton Mikofsky <[antonmikofsky@aol.com](mailto:antonmikofsky@aol.com)>  
**Cc:** Lindeman, Thomas (LAW) <[tlindema@law.nyc.gov](mailto:tlindema@law.nyc.gov)>  
**Subject:** Re: [EXTERNAL] Toth v. NYC DOE

Counsel,

It is completely inappropriate for you to have filed your letter while Defendant is still working on their position because of your delays, and then claim in footnote 1 of your letter that "From Defendant, Plaintiff received no proposed submission to the Court."

Best,

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**From:** Anton Mikofsky <[antonmikofsky@aol.com](mailto:antonmikofsky@aol.com)>  
**Date:** Tuesday, September 9, 2025 at 3:08 PM  
**To:** Vyas, Jaimini (LAW) <[JVyas@law.nyc.gov](mailto:JVyas@law.nyc.gov)>  
**Subject:** [EXTERNAL] Toth v. NYC DOE

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Dear Attorney Vyas:

1. I attach the Exhibits as redacted, hopefully correctly. Your comments are welcome.
2. School Year 2024-25 complaint is clearly listed in Footnote 1 of the Declaration stating that #284080 was filed on August 23, 2024. It also indicated that it's on Appeal, SRO case #25-208. See also Ex. K, request for review.
3. Sorry about 162 pages but the largest documents include New York administrative decisions that you already have for some time and must have already reviewed. They are included for the benefit of the Federal court.
4. No need to file an integrated Letter in "Word" format, subject to editing. Suffice that a joint letter can be in two parts, first: Plaintiff's part and second, Defendant's part [which

I want to see]. Let us submit that way.

Very truly yours,

Anton Mikofsky

Note:

5 exhibits in separate email due to space limit